

## **REMARKS**

Claims 1-33 are now pending in the application. Claims 1-33 stand rejected. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

## **SPECIFICATION**

As indicated above, the specification as filed is to be replaced with the attached substitute specification. The substitute specification contains no new matter.

## **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Endo et al. (U.S. Pat. No. 6,335,754) in view of Gluck (U.S. Pat. No. 4,672,435). This rejection is respectfully traversed.

1. Regarding Claims 1-11, the examiner comments that Endo et al. (Endo hereafter) teaches all the elements of Claim 1, but fails to disclose that such elements are taught as a method for automatically navigating a ground vehicle using a plurality of fixed video cameras mounted to the vehicle and using an autonomous navigation system (ANS) programmed to operate with pan/tilt cameras, as recited in Claim 1. The Examiner additionally comments that Gluck teaches such a method and that combined with the teachings of Endo, one skilled in the art would derive the method recited in Claim 1.

a. Applicant respectfully submits that the Examiner has failed to present a prima facie §103 rejections. Applicant respectfully submits that Gluck does not describe, show or suggest a method for automatically navigating a ground vehicle using a plurality of *fixed* cameras, as recited in Claim 1, but rather describes a system equipped with an image device 1 mounted to a telescope mast 4 freely movable in azimuth and elevation to track a target. Additionally, Applicant submits that Gluck does not describe, show or suggest such a method that includes using an autonomous navigation system (ANS) programmed to operate with pan/tilt cameras, as recited in Claim 1. Rather, Gluck describes providing images from the pivoting image device 1 to a plurality of monitors 9 arranged in a semispherical distribution around an observer 10.

Thus, Gluck does not describe, show or suggest the method recited in Claim 1. Additionally, Endo generally describes an image acquiring system that records time stamped images from a plurality of cameras mounted to a vehicle. Applicant respectfully submits the single image device movably mounted on a mast, as taught in Gluck, could not and would not be combined with the image acquisition system of Endo to construct a system that functions to provide the method of automatically navigating a ground vehicle and using an autonomous navigation system (ANS) programmed to operate with pan/tilt cameras, as recited in Claim 1.

For at least the reasons set forth above, Applicants submits that a prima facie §103 rejection has not been provided by the Examiner and respectfully request that the present §103 rejections of Claims 1-11 be withdrawn.

b. Furthermore, Applicant respectfully submits that Endo does not describe, show or suggest all the elements of the method of automatically navigating a ground vehicle recited in Claim 1.

For example, Endo does not describe, show or suggest generating commands at *an output of an autonomous navigation system (ANS) for controlling the position of pan/tilt cameras*. Rather, Endo, is *silent regarding an ANS* and merely describes seven cameras (20a through 20g) for sensing images that are controlled by a PC 30 over a RS232C interface bus. *The PC 30 sends time code inquiry signals* to the cameras 20 and, in response, receives time code information. Thus, Applicant submits that sending time code inquiry signals from a PC to a plurality of imaging device, as taught in Endo, does not describe, show or suggest generating commands at an ANS for controlling the position of pan/tilt cameras, as recited in Claim 1.

As another example, Endo does not describe, show or suggest *converting the ANS command signals* into signals representing azimuths and elevations *that the pan/tilt cameras would view*. Rather, Endo describes an imaging system including a GPS sensor 40, a posture sensor 41 and *an azimuth sensor 42* connected to the PC 30. *The azimuth sensor 42 provides azimuth data of the vehicle* at the time indicated by the time code inquiry signal. Thus, Applicant submits that the sensor providing azimuth data of the vehicle, as taught in Endo, does not describe, show or suggest converting a

signal from an ANS into an azimuth and elevation that a pan/tilt camera would view, as recited in Claim 1.

As yet another example, Endo does not describe, show or suggest *mapping the azimuth and elevation signals to selected addresses* containing video data. Rather, Endo describes sending searching for image data on a given tape 22 by *designating the time code* corresponding to the image data. Thus, Applicant submits that retrieving image data by designating the time code of the data, as taught in Endo, does not describe, show or suggest mapping azimuth and elevation signals to selected addresses of stored video data, as recited in Claim 1.

As still another example, Endo does not describe, show or suggest *reformatting the video data* from the selected addresses and *inputting the reformatted video data to the ANS as video streams*. Rather, Endo describes interpolating image data to form panoramic *images* that are stored in a panoramic image database that is used as a source of *images* in a walkthrough system. Thus, Applicant submits that forming panoramic images to be stored in a database, as taught in Endo, does not describe, show or suggest reformatting the video data and inputting the reformatted video data to the ANS as video streams, as recited in Claim 1.

As remarked above, the Examiner cites Gluck only with regard to the preamble of Claim 1 and comments that Endo teaches each and every elements of the method recited in Claim 1.

Therefore, for at least the reasons set forth above, Applicant submits that neither Endo nor Gluck, independently or in combination, describe, show or suggest the recitations of Claim 1. Accordingly, Applicant submits that Claim 1 is patentable over Endo in view of Gluck.

Claims 2-11 depend from Claim 1. Accordingly, when the recitations of Claims 2-11 are considered in combination with the recitations of Claim 1, Applicant submits that Claims 2-11 are likewise patentable over Endo in view of Gluck.

2. Regarding Claims 12-14, Claim 12 includes, among other recitations, recitations similar to those presented in Claim 1. Therefore, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the

Examiner has not provided a prima facie §103 rejection of Claims 12-14 and requests that the present §103 rejections of Claims 12-14 be withdrawn.

Additionally, Applicant respectfully submits that, for at least the reasons set forth above with regard to Claim 1, Claim 12 is patentable over Endo in view of Gluck. Claims 13 and 14 depend from Claim 12. Thus, when the recitations of Claims 13 and 14 are considered in combination with the recitations of Claim 12, Applicant submits that Claims 13 and 14 are likewise patentable over Endo in view of Gluck.

3. Regarding Claims 15-24, Claim 15 includes, among other recitations, recitations similar to those presented in Claim 1. Therefore, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a prima facie §103 rejection of Claims 15-24 and requests that the present §103 rejections of Claims 15-24 be withdrawn.

Additionally, Applicant respectfully submits that, for at least the reasons set forth above with regard to Claim 1, Claim 15 is patentable over Endo in view of Gluck. Claims 16-24 depend from Claim 15. Thus, when the recitations of Claims 16-24 are considered in combination with the recitations of Claim 15, Applicant submits that Claims 16-24 are likewise patentable over Endo in view of Gluck.

4. Regarding Claims 25 and 26, Claim 26 includes, among other recitations, recitations similar to those presented in Claim 1. Therefore, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a prima facie §103 rejection of Claims 25 and 26 and requests that the present §103 rejections of Claims 25 and 26 be withdrawn.

Additionally, Applicant respectfully submits that, for at least the reasons set forth above with regard to Claim 1, Claim 25 is patentable over Endo in view of Gluck. Claim 26 depends from Claim 25. Thus, when the recitations of Claim 26 are considered in combination with the recitations of Claim 25, Applicant submits that Claim 26 is likewise patentable over Endo in view of Gluck.

5. Regarding Claim 27, Claim 27 includes, among other recitations, recitations similar to those presented in Claim 1. Therefore, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a prima facie §103 rejection of Claim 27 and requests that the present §103 rejections of Claim 27 be withdrawn.

Additionally, Applicant respectfully submits that, for at least the reasons set forth above with regard to Claim 1, Claim 27 is patentable over Endo in view of Gluck. Claim 26 depends from Claim 25.

6. Regarding Claims 28-31, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a prima facie §103 rejection of Claims 28-31 and requests that the present §103 rejections of Claims 28-31 be withdrawn.

Additionally, Applicant respectfully submits that neither Endo nor Gluck, independently or in combination, describe, show or suggest all the elements of the method of autonomously navigating a vehicle, as recited in Claim 1. The Examiner comments that Endo fails to disclose autonomous navigation a ground vehicle using a plurality of fixed video cameras mounted to the vehicle. As set forth above, Gluck describes providing images from the pivoting image device 1 to a plurality of monitors 9 arranged in a semispherical distribution around an observer 10. Thus, Applicant respectfully submits that neither Endo nor Gluck, independently or in combination, describe, show or suggest autonomously navigating a vehicle at least partially in response to selected data, as recited in Claim 28.

Therefore, for at least the reasons set forth above, Applicants submits that Claim 28 is patentable over Endo in view of Gluck. Claims 29-31 depend from Claim 28. Thus, when the recitations of Claims 29-31 are considered in combination with the recitations of Claim 28, Applicant submits that Claims 29-31 are likewise patentable over Endo in view of Gluck.

7. Regarding Claim 32, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a

prima facie §103 rejection of Claim 32 and requests that the present §103 rejection of Claim 32 be withdrawn.

Additionally, Claim 32 includes, among other recitations, recitations similar to those presented in Claim 28. Therefore, for at least the reasons set forth above with regard to Claim 28, Applicant submits that Claim 25 is also patentable over Endo in view of Gluck.

8. Regarding Claim 33, in accordance with the remarks set forth above with regard to Claim 1, Applicant respectfully submits that the Examiner has not provided a prima facie §103 rejection of Claim 33 and requests that the present §103 rejection of Claim 32 be withdrawn.

Additionally, Claim 32 includes, among other recitations, recitations similar to those presented in Claim 1. Therefore, for at least the reasons set forth above with regard to Claim 1, Applicant submits that Claim 33 is also patentable over Endo in view of Gluck.

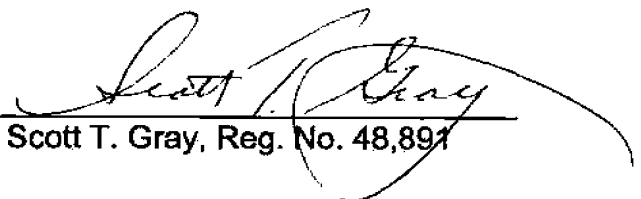
For at least the reasons set forth above, Applicants respectfully request that the §103 rejections of Claims 1-33 be withdrawn.

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (314) 726-7525.

Respectfully submitted,

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